

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Santiago Soto-Garcia v. Warden Ian Healy

No. 4:25-cv-01787 (N.D. Ohio Dec. 16, 2025) · No. 4:25-cv-01787 · Decided December 16, 2025

SUMMARY

The court denied a federal inmate’s 28 U.S.C. § 2241 petition challenging a disciplinary finding for fighting another person and the resulting loss of good-time credits. The court held that the disciplinary proceedings satisfied due process and that the finding was supported by some evidence, including surveillance footage, medical records, photographs, and the petitioner’s statements. The action was dismissed, and the court certified that an appeal could not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Bridget Meehan Brennan
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	December 16, 2025
DOCKET	4:25-cv-01787
DISPOSITION	dismissed
PROCEDURAL POSTURE	Federal inmate Santiago Soto-Garcia filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging a prison disciplinary conviction, the loss of good-time credits, and related sanctions. The district court screened the petition and denied relief, dismissing the action under 28 U.S.C. § 2243.
STANDARD OF REVIEW	On preliminary habeas review under 28 U.S.C. § 2243 and Rule 4 of the Rules Governing § 2254 Cases, as applied to § 2241 petitions, the court may dismiss when the petition shows that the petitioner is not entitled to relief. A prison disciplinary determination satisfies due process if it is supported by some evidence; the reviewing court does not independently assess credibility or reweigh the evidence.
PRECEDENTIAL VALUE	Unpublished district court opinion; persuasive value only

PARTIES

Santiago Soto-Garcia v. Warden Ian Healy

TOPICS

federal habeas corpus

procedural due process

prisoners rights

due process

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PRACTICE AREAS

Habeas corpus

Prison disciplinary proceedings

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Federal post-conviction relief

QUESTIONS PRESENTED

1. Whether the disciplinary hearing violated due process because Soto-Garcia allegedly did not receive adequate notice, an adequate opportunity to present a defense, or a written statement of the evidence and reasons supporting the sanction.
2. Whether the DHO's finding that Soto-Garcia fought another person was supported by some evidence.
3. Whether the district court could reconsider the DHO's self-defense analysis, credibility determinations, and weighing of the evidence.

HOLDINGS

1. The disciplinary hearing satisfied due process because Soto-Garcia received written notice before the hearing, had an opportunity to present documentary evidence and to call witnesses, and received a written DHO report explaining the evidence relied upon and the reasons for the disciplinary action.
2. The DHO's finding that Soto-Garcia fought another person was supported by some evidence and therefore complied with due process.
3. The court could not reweigh the evidence, reassess credibility, or substitute its judgment for the DHO's determination regarding self-defense.

KEY QUOTATIONS

“For a disciplinary action to comport with due process, it must be supported by “some evidence.”” (II. Law and Analysis)

“In evaluating whether the disciplinary determination was properly supported, the district court does not examine the entire record, independently assess the credibility of witnesses, or weigh the evidence.” (II. Law and Analysis)

FACTUAL BACKGROUND

On February 14, 2024, another inmate entered Soto-Garcia's cell and physically attacked him, after which the two inmates exchanged blows. Soto-Garcia was charged with fighting another person and received notice, a disciplinary hearing, and a written DHO report. The DHO considered CCTV footage, staff and medical reports, photographs, and Soto-Garcia's own admission that he had engaged in a physical altercation, and imposed the loss of 27 days of good-time credits, 14 days of disciplinary segregation, and 180 days of lost privileges.

PROCEDURAL HISTORY

Soto-Garcia was found guilty by a Bureau of Prisons disciplinary hearing officer of fighting another person and lost 27 days of good-time credits, served 14 days in disciplinary segregation, and lost privileges for 180 days. He exhausted his regional and Central Office administrative appeals. He then filed this § 2241 petition, alleging that the disciplinary process violated due process and that the finding was unsupported by the evidence. The district court denied the petition and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- Rice v. White, 660 F.3d 242, 249 (6th Cir. 2011)
- Alexander v. N. Bureau of Prisons, 419 F. App'x 544, 545 (6th Cir. 2011)
- Allen v. Perini, 424 F.2d 134, 141 (6th Cir. 1970)
- Urbina v. Thoms, 270 F.3d 292, 295 (6th Cir. 2001)
- Sandin v. Conner, 515 U.S. 472, 484 (1995)
- Wolff v. McDonnell, 418 U.S. 539, 563-67 (1974)
- Damron v. Harris, No. 21-3877, 2022 U.S. App. LEXIS 20963, 2022 WL 4587625, at *3 (6th Cir. July 28, 2022)
- Superintendent, Mass. Corr. Inst., Walpole v. Hill, 472 U.S. 445, 455-56 (1985)